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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DR. VICKI MAZZORANA, M.D.,

Plaintiff,

v.

**EMERGENCY PHYSICIANS
MEDICAL GROUP, INC., et. al.,**

Defendants.

Case No. 2:12-cv-1837-JCM-(PAL)

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT'S MOTION TO DISMISS**

(First Request)

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and the Court's Local Rule 7-2, Plaintiff, Dr. Vicki Mazzorana, M.D., respectfully requests that the Court extend, to and until May 8, 2013, the current deadline for responding to Defendants' motion to dismiss. This is Plaintiff's first request for extension of time. Plaintiff's response to Defendants' pending dispositive motion is currently due on April 29, 2013.

In support of this motion, Plaintiff relies upon the memorandum of points and authorities set forth below.

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. . .

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1)(A) provides that “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires . . .” It is within a trial court’s sound discretion to determine whether to grant an extension of time. Ahanchian v. Xenon Pictures, Inc., 624 F.3d 1253, 1258 (9th Cir. 2012). In this case, “good cause” exists for the requested extension of time.

Lead counsel for Plaintiff, Ruth L. Cohen, has been suffering from recent illness¹ that has prevented her from devoting the time necessary to meeting a number of deadlines in her cases, including the one pending in this case. While it was anticipated that Ms. Cohen would currently be preparing a response to Defendants’ motion to dismiss, she suffered an unfortunate relapse of her illness that has prevented her from devoting the time necessary to accomplishing the foregoing task. Despite his own heavy caseload,² undersigned counsel will be required to address the numerous deadlines in Ms. Cohen’s cases, including taking responsibility for meeting the deadlines in this and many other cases.

In light of the foregoing, undersigned counsel will need additional time to prepare and file Dr. Mazzorana’s response to the pending motion to dismiss. For instance,

¹ Ms. Cohen has been diagnosed with pneumonia. Thankfully, she is recovering but has a weakened condition that has kept her from the office for a significant period of time. Given her weakened condition, it is uncertain how much time she will be able to devote to office matters.

² Undersigned counsel is working to respond to two separate summary judgment motions in Carrillo v. Las Vegas Metropolitan Police Department, 2:10-cv-2122-APG-(GWF). The responses are due on April 30, 2013.

1 apart from drafting the actual response, undersigned counsel will need to familiarize
 2 himself with Defendants' dispositive motion. An additional eleven days will be
 3 necessary to accomplish this task. Indeed, in addition to preparing the response,
 4 undersigned counsel will also be balancing other competing case commitments during
 5 this time frame. However, an additional eleven days should provide adequate time for
 6 undersigned counsel to file an appropriate response to Defendants' motion to dismiss.

7 CONCLUSION

8 In light of the foregoing, Plaintiff, by and through undersigned counsel,
 9 respectfully requests that the Court provide her with an additional eleven days, to and
 10 until May 8, 2013, file a response to the pending dispositive motion.

11 Respectfully submitted,

12 */s/ Paul S. Padda*

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17 Attorneys for Plaintiff

18 Dated: April 24, 2013

19 **IT IS SO ORDERED:**

20 **Plaintiff's request for an extension of time to**
 21 **respond to the pending dispositive motion is**
 22 **hereby granted. Plaintiff's response shall be due**
on or before May 8, 2013.

23 *James C. Mahan*
 24 UNITED STATES DISTRICT JUDGE

25 **Dated: April 30, 2013**

CERTIFICATE OF SERVICE

In compliance with the Court's Local Rules, the undersigned hereby certifies that on April 24, 2013 a copy of the foregoing document, "PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS" was served (via the Court's CM/ECF system) upon counsel of record for Defendants.

/s/ Paul S. Padda

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